

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

JUN - 9 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Telephone Number Portability )

NSD File No. L-98-71

CC Docket No. 95-116

REPLY COMMENTS OF THE SOUTHERN NEW ENGLAND TELEPHONE  
COMPANY

The Southern New England Telephone Company ("SNET"), respectfully submits its Reply Comments ("Reply") to MCI's opposition to SNET's petition for waiver of the Phase III implementation deadline for long-term number portability ("LNP") in one switch, New Britain, in the Hartford Metropolitan Statistical Area ("MSA").<sup>1</sup>

In its Reply, SNET responds to MCI's Opposition and provides additional information that supports SNET's request for a waiver of the New Britain central office implementation until December 12, 1998. MCI's Opposition is unwarranted.

SNET is fully committed and has made every effort to meet the Commission's LNP requirements to ensure that the LNP implementation in Connecticut is in full compliance with the Commission's rules. LNP implementation in Connecticut is underway and on target in thirty-three of thirty-four host office switches. Implementation of all thirty-three offices is scheduled for completion by the June 30, 1998 deadline. To

<sup>1</sup> The Southern New England Telephone Company, Petition for Waiver of Local Number Portability Implementation Deadline, NSD File No. L-98-71, *Telephone Number Portability*, CC Docket No. 95-116

No. of Copies rec'd  
List A B C D E

ensure a smooth implementation schedule SNET has provided and continues to provide ongoing progress reports of LNP activity to other service providers throughout the planning and implementation processes.

In 1996, the Department of Public Utility Control ("DPUC") in Docket 96-02-02, established the certified local exchange carriers ("CLEC") Working Group.<sup>2</sup> The DPUC required the Working Group to hold discussions and attempt to reach industry consensus on the technical, administrative, and operational issues associated with the implementation of local exchange competition in Connecticut. Working Group members consist of representatives of CLECs, including MCI, along with SNET and the Connecticut Office of Consumer Counsel. Working Group meetings began in July 1997. Two meetings were held to discuss the list of potential offices for LNP implementation. The CLECs were informed by SNET at those meetings that three offices potentially could not be completed by June 1998. By August, 1997 SNET had found solutions to enable two of the three offices to have LNP implemented by June, 1998.

On August 18, 1997, the Working Group held a conference call with the purpose of reviewing and approving the LNP deployment schedule of the Hartford MSA. In that session SNET confirmed with the CLECs that the LNP implementation in the New Britain office could not be implemented by June, 1998, and SNET required a three-month extension until September 30, 1998. SNET explained that LNP availability would occur coincident with a previously scheduled digital switch upgrade. The CLECs, including

---

<sup>2</sup> Docket 96-02-02, Certified Local Exchange Carrier (CLEC) Working Group Reporting Docket, March 11, 1996.

MCI, unanimously approved the deployment schedule. The CLECs also ranked the New Britain switch among the lower priority switches to be converted to LNP in the Hartford MSA.

SNET has consistently demonstrated its commitment to meeting the aggressive timelines of LNP deployment in the Hartford MSA, even when technical barriers have occurred. On April 9, 1998 SNET notified members of the CLEC Working Group that a problem between Operator Service Position System (“OSPS”) systems and fraud control systems created a blocking of ported numbers and that LNP implementation would be delayed in two switches, Hartford and West Hartford. SNET worked to resolve the issue, and on April 15, 1998 SNET notified the CLEC Working Group that SNET fixed the trouble and both switches were LNP capable. In its Opposition, MCI suggests that SNET’s decision to upgrade the New Britain switch is a means to further delay the competitive benefits of competition. The successful on-time conversion of the Hartford and West Hartford switches clearly demonstrates SNET’s dedication to be in compliance with the Commission’s orders on LNP.

On April 22, 1998 SNET advised the members of the Northeast Region LNP Operations and Implementation Sub-Committee, of which MCI is also a member, that SNET would be requesting an extension to implement LNP in the New Britain office until December 12, 1998, because of modernization efforts to support a new digital 911 emergency system. The New Britain switch is one of two tandem switches in Connecticut to support the enhanced emergency services. The New Britain switch

represents approximately 4.5% of the lines in the Hartford MSA. SNET indicated that the work would be completed in two phases: 1) Migrating the 911 features into the 5ESS switch for testing; and 2) Installing the lines to the 5ESS switch. SNET's request for an extension was again unopposed by the participants, including MCI, at this session.

SNET's petition for waiver for an extension for LNP implementation in the New Britain switch is for good cause. SNET is working hard to meet a rigorous schedule of central office upgrades. If the existing 1AESS switch in New Britain were forced to convert to LNP as MCI suggests in its Opposition, technical resources would be diverted from meeting the overall conversion schedule in the state. It is estimated that labor requirements would be twelve man-days to convert the 1AESS switch. These resources are scheduled to complete other upgrades for the state. Presently, SNET and its switch vendor are completing four generic upgrades per weekend statewide and resources are on a strict timeline. Upgrading the 1AESS switch first would disrupt the schedule and would be a poor utilization of limited resources as the 5ESS switch would be made LNP capable within a short time frame.


The sequence of modernization that SNET proposes in its petition for waiver is logical and reasonable. The 911 functionality should be taken off the 1AESS switch first, and testing must be done on a "clean switch" to ensure network reliability. The enhanced emergency service upgrade on the New Britain tandem office is a first office application ("FOA") for the vendor, and subscriber's access to emergency services cannot be put at

risk. Upgrading the 1AESS switch to a 5ESS first would jeopardize network reliability and put customers at risk.

### CONCLUSION

SNET is working diligently to meet the LNP implementation schedule in the Hartford MSA and is on schedule in thirty-three of thirty-four offices. SNET actively participates in industry forums to discuss and resolve issues related to LNP and has been proactive in communicating information including implementation dates, to other service providers, including MCI. The modernization sequence for the New Britain tandem that SNET proposes makes sense as it provides enhanced 911 services, a digital upgrade and LNP capability while maintaining network reliability and ensuring customer access to emergency services. SNET's requested delay until December, 1998 is a reasonable deferral that would allow a more efficient utilization of technical resources to implement LNP. SNET respectfully requests that the Commission grant SNET's petition for waiver.

Respectfully submitted,

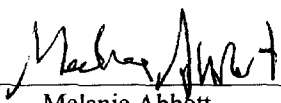


Wendy S. Bluemling  
Director - Regulatory Affairs & Public Policy  
227 Church Street  
New Haven, CT 06510  
(203) 771-8514

June 8, 1998

CERTIFICATE OF SERVICE

I, Melanie Abbott, hereby certify that on this 9th day of June, 1998, a true copy of the foregoing Petition of SNET was sent via first class mail, postage prepaid or hand delivered to each of the parties listed below:

  
\_\_\_\_\_  
Melanie Abbott

A. Richard Metzger, Jr.\*  
Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N. W. – Room 500  
Washington, D.C. 20554

Magalie Roman Salas\*  
Secretary\*  
Federal Communications Commission  
1919 – M Street, N. W.  
Washington, D. C. 20554

Alvin McCloud \*  
Common Carrier Bureau  
FCC  
2000 M Street, N.W.  
Suite 235  
Washington, DC 20554

ITS\*  
2100 M St., NW – Rm. 140  
Washington, D. C. 20554

Marian Gordon \*  
Common Carrier Bureau  
FCC  
2000 M Street, N.W.  
Suite 235  
Washington, DC 20554

Geraldine Matisse\*  
Network Services Div.  
Common Carrier Bureau  
FCC  
2000 M Street, N.W.  
Room 246  
Washington, DC 20554

Counsel for MCI:  
Christy C. Kunin  
Glen B. Manishin  
Blumenfeld & Cohen  
1615 M Street, N.W., Suite 700  
Washington D.C. 20036

\* Hand Delivered